

EXHIBIT C

From: [Houghton-Larsen, M Annie](#)
To: [Joseph Cammarata, Esq.](#)
Cc: [Kenneth Caruso](#); [David Labkowski](#); [Gottlieb, Michael](#); [Governski, Meryl Conant](#); [Nathan, Aaron E.](#); [Rachel Goodman](#); [MacCurdy, Maggie](#); [Knoblett, John Tyler](#); [Haser, Perri](#); [Gottlieb, Michael](#); [Governski, Meryl Conant](#); [Nathan, Aaron E.](#)
Subject: RE: Freeman v. Giuliani No. 24-cv-6563 (LJL) - First Set of Interrogatories
Date: Friday, November 22, 2024 5:19:29 PM

Joe,

Thanks again for the meet and confer re interrogatories. We appreciate that you are still getting up to speed, but as you know your trial is fast approaching and this is not the first time your client has been deficient in returning discovery. To that end, we are happy to give you until Tuesday November 26 at 2 p.m. to return verified interrogatory responses. This way, if we need to move to compel, which we sincerely hope we don't, we will be able to do so before Thanksgiving. As we discussed, your client will be in New York for the hearing Tuesday which should make his compliance easier.

Thank you,
Annie

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Thanks Joe, I can call you in 10 minutes.

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*** EXTERNAL EMAIL ***

I can speak now. Are you available?

Regards,

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On Nov 22, 2024, at 1:45 PM, Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com> wrote:

Counsel,

We did not receive anything in response to Plaintiffs' first set of interrogatories yesterday. Please advise if you are available to meet and confer this afternoon or if the responses to the interrogatories are forthcoming by 10 a.m. Monday.

Thank you,
Annie

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Counsel,

Please find attached Plaintiffs' first set of interrogatories. Per the Court's Order, ECF No. 53, Mr. Giuliani's response is due on November 21.

Please also find attached a contention interrogatory, which per the Court's Order at ECF No. 53, is due no later than two weeks prior to Mr. Giuliani's deposition.

Thank you,

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